

1 **SAMPSON & ASSOCIATES**  
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 4 Attorneys for Creditor Bradley Proulx

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SOUTHERN DISTRICT OF CALIFORNIA	
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9 **UNITED STATES BANKRUPTCY COURT**10 **SOUTHERN DISTRICT OF CALIFORNIA**

11  
 12 In Re: ) **CASE NO.: 99-33191-B7**  
 13 )  
 13 SARA NEWSOME BURNS, ) **NOTICE OF MOTION AND MOTION**  
 14 ) **OBJECTING TO DEBTOR'S**  
 14 ) **AMENDED EXEMPTION CLAIM**  
 15 )  
 15 Debtor. ) **Date: 5-30-00**  
 16 ) **Time: 11:00 a.m.**  
 16 ) **Ctrm: 4**  
 16 ) **Hon. Peter W. Bowie**  
 17

18 **TO ALL PARTIES IN INTEREST:**

19 **PLEASE TAKE NOTICE** that Creditor Bradley Proulx will and  
 20 hereby does bring a Motion Objecting to Debtor Burn's Amended  
 21 Exemption, on the above date and time, or as soon thereafter as  
 22 this matter may be heard in time in Courtroom 4 of the United  
 23 States Bankruptcy Court for the Southern District of California,  
 24 located at 325 West F Street, San Diego, California 92101.

25 This motion is based upon Debtor's Amended Exemption filed on  
 26 or about March 14, 2000, as well as 11 U.S.C. §522, Bankruptcy Rule  
 27 4003, California Code of Civil Procedure §704.730, debtor's  
 28 employability and debtor's bad faith conduct.

1 Any opposition or other response to this motion must be served  
2 upon the undersigned and the original and one (1) copy of such  
3 papers with proof of service must be filed with the Clerk of the  
4 United States Bankruptcy Court at 325 West F Street, San Diego,  
5 California 92101-6991, not later than fourteen (14) days from the  
6 date of service. If you were served by mail, you have three (3)  
7 additional days to take the above-stated actions.

8 This motion is based upon this Notice of Motion and Motion,  
9 the attached Memorandum of Points and Authorities, the attached  
10 Declarations, the attached Exhibits as well as the pleadings and  
11 records on file herein.

12 DATED: April 13, 2000

Respectfully submitted,

13 **SAMPSON & ASSOCIATES**

14  
15 By:

  
16 Bryan D. Sampson  
17 Attorney for Creditor  
18 Bradley Proulx

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